

Sonnenschein
SONNENSCHNEIN NATH & ROSENTHAL LLP

1221 Avenue of the Americas
New York, NY 10020-1089
212.768.6700
212.768.6800 fax
www.sonnenschein.com

Arthur H. Ruegger
212.768.6881
aruegger@sonnenschein.com

June 12, 2007

VIA FACSIMILE

MEMO ENDORSED

Chambers of the Hon. Stephen C. Robinson
United States District Court
For the Southern District of New York
300 Quarropas Street
White Plains, N.Y. 10601

Re: Kehoe, *et al.* v.
Panorama Labs Pty, Ltd., *et al.*
No. 07 Civ. 3168 (SCR) (S.D.N.Y.)

Dear Judge Robinson:

This firm is counsel to two defendants in the above action, ST Synergy Ltd. and Mr. John Athans. With the agreement of counsel to all the other parties we are writing to request adjournments of the deadlines for defendants to move or otherwise respond to the complaint and for submission of the Scheduling Order (both currently set for June 22, 2007) to July 27, 2007.

The only previous adjournment of the deadline for defendants to respond to the complaint, and the deadline for all parties to submit a proposed Scheduling Order, to June 22, 2007, was requested by letter dated May 23, 2007, from plaintiffs' counsel, and granted by Your Honor's endorsement on May 25, 2007.

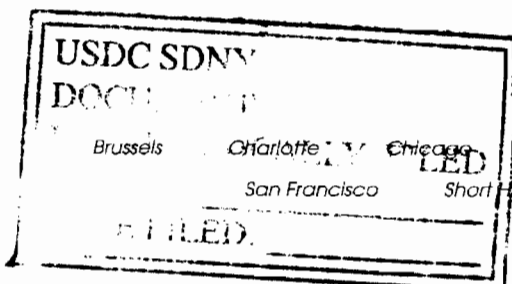
The reason for this request is so that service of process may be completed. All of the defendants are located in Western Australia, where the time is 12 hours different than New York's. This time difference and distance present logistical challenges for gathering information and effecting service. In addition, we understand Australia is not a signatory to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents, and consequently, absent court order to the contrary, under Fed. R. Civ. P. 4(f)(2) service must be made in the manner prescribed by the law of Western Australia. Counsel have investigated the requirements of Western Australia law and the facts related to the attempted service. We understand that only

APPLICATION GRANTED

Stephen C. Robinson

HON. STEPHEN C. ROBINSON

6/14/07



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one of the six defendants has been served to date. Counsel for the plaintiffs believes that the requested adjournment to July 27, 2007, should allow sufficient time to effect service on the remaining defendants.

If these adjournments are acceptable, we understand from Chambers that Your Honor may follow the same practice as with the above letter, endorsing this letter before filing with the clerk. If Your Honor requires a proposed stipulation and order, or a different procedure, please advise us and we will promptly comply.

We appreciate Your Honor's consideration of this request.

Respectfully submitted,

SONNENSCHN NATH & ROSENTHAL LLP

By: 

Arthur H. Ruegger (AR 8329)

cc: Richard M. Mahon, II, Esq. (Fax: 845-565-1999)
Counsel to Plaintiffs
Robert P. Lewis, Esq. (Fax: 212-310-1600)
Counsel to remaining defendants